

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

JASON WILLIAMS,

Plaintiff,

v.

AT&T MOBILITY LLC,

Defendant.

Case No.: 5:19-cv-00475-BO

**DECLARATION OF NANCY L. STAGG ISO AT&T'S UNOPPOSED
MOTION TO SEAL CERTAIN FILED EXHIBITS**

I, Nancy L. Stagg, declare as follows:

1. I am a U.S. citizen over the age of eighteen (18) years. I make this Declaration in support of Defendant AT&T Mobility LLC's ("AT&T") Unopposed Motion to Seal certain exhibits previously submitted by Plaintiff Jason Williams in support of Williams' Opposition to AT&T's Motion for Summary Judgment (ECF 140-145). The facts set forth in this Declaration are stated upon my own personal knowledge. If called to testify to the following, I could do so truthfully and competently.

2. I am an attorney duly licensed and admitted to practice law in the State of California and am admitted pro hac vice in this action. I am a partner in the law firm of Kilpatrick Townsend & Stockton LLP. I am counsel of record for Defendant AT&T Mobility LLC in this action.

3. During the pendency of the action, on or about June 16, 2020, the Court entered a case Protective Order, EFC 47. The Protective Order required the Parties to maintain as confidential and specially handle certain documents, testimony and information produced by a Producing Party that was marked Confidential. AT&T produced to Plaintiff's counsel certain documents and information in this case that were marked as Confidential, including the three Exhibits at issue on this Motion. The Protective Order extended the jurisdiction of the Court to address issues related to the Protective Order even after the conclusion of the case.

4. Plaintiff's counsel inadvertently publicly filed the three Exhibits at issue on May 3, 2022, ECF 144. AT&T's counsel was not informed in advance that the documents were being publicly filed and the documents were included in over 600 pages of documents attached to Plaintiff's Appendix of Exhibits, ECF 144.

5. The three documents AT&T seeks to seal by this Motion were marked Confidential by AT&T because: the account notes provide detailed information about Plaintiff and his then-AT&T account and wireless telephone service and provide information regarding procedures, processes and methods of collection of account and subscriber information; the deposition testimony of an AT&T employee and the document reveal AT&T confidential information, namely, methods, procedures and processes regarding AT&T account security and SIM changes. Having this information remain publicly available could cause harm to AT&T if further disclosed.

6. Upon discovery that the documents were publicly filed on the case docket, I contacted Plaintiff's counsel, who responded that Plaintiff did not object to and would not oppose this Motion to Seal.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 7th day of November 2023 at San Diego, California.

/s/ Nancy L. Stagg
Nancy L. Stagg